

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,  
STATE OF CALIFORNIA, STATE OF  
COLORADO, STATE OF ILLINOIS,  
STATE OF INDIANA, STATE OF IOWA,  
STATE OF MINNESOTA, STATE OF  
NEBRASKA, STATE OF OREGON,  
STATE OF TENNESSEE, STATE OF  
TEXAS, STATE OF WASHINGTON, and  
STATE OF WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,  
SYNGENTA CORPORATION,  
SYNGENTA CROP PROTECTION, LLC,  
and CORTEVA, INC.,

Defendants.

Case No. 1:22-cv-00828-TDS-JEP

**[PROPOSED] ORDER**

Upon consideration of Plaintiffs' Motion to Compel Discovery of Syngenta Crop Protection AG, Syngenta Corporation, and Syngenta Crop Protection, LLC ("Syngenta"), it is hereby ORDERED that the Motion is GRANTED. Syngenta is hereby ordered to do the following:

1. Produce Syngenta Crop Protection AG documents and information as follows:
  - a. Search, and produce responsive documents from, the custodial files of the following Syngenta Crop Protection AG custodians: Jon Parr, Jeff Rowe, and David Scott.

- b. Conduct a reasonable search for any central repositories of responsive material within Syngenta Crop Protection AG, and produce responsive files from those central repositories.
2. Modify Syngenta's proposed search protocol to add Plaintiffs' search terms to the first stage of the protocol as set forth in Plaintiffs' memorandum in support of its motion to compel.
3. With respect to RFPs 27–29 and 32(a)–(b), produce data related to Syngenta products containing active ingredients, or active ingredients themselves, that are marketed as fungicides or herbicides, and products containing the active ingredients abamectin and lambda cyhalothrin (or the active ingredients themselves). For the active ingredients metolachlor, abamectin, and lambda cyhalothrin, the time period of this production should run from January 1, 2002, to December 31, 2023. For other active ingredients, the time period of production should run from January 1, 2012, to December 31, 2023.
4. Search, and produce responsive materials from, the custodial file of Andrew Fisher for the period January 1, 2015, to April 19, 2024.

Dated: \_\_\_\_, 2024

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